

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbkllp.com)

4 Peter J. Benvenutti (#60566)

5 (pbenvenutti@kbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED
DEBTORS' THIRTEENTH OMNIBUS
OBJECTION TO CLAIMS (INCORRECT
DEBTOR CLAIMS)**

Response Deadline:
October 14, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 28, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **October 28, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended*
7 *General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020,
all hearings through September 30, 2020 will be held by video or teleconference. **Parties are advised**
8 **to visit the Bankruptcy Court’s website, at www.canb.uscourts.gov, prior to the hearing date to**
9 **determine whether the Omnibus Hearing will be conducted telephonically and the courtroom**
10 **will be closed.** If so, all parties who wish to appear at the Omnibus Hearing must make arrangements
to appear telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on
the day before the Omnibus Hearing. Further information regarding telephonic appearances via
CourtCall can be found on the Bankruptcy Court’s website, at the following location:
11 www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for
Appearances by Telephone. Charges have been waived by CourtCall for pro se parties.

12 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
13 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Thirteenth*
14 *Omnibus Objection to Claims (Incorrect Debtor Claims)*, filed on September 17, 2020 [Dkt. No. 9067]
(the “**Omnibus Objection**”).

15 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
16 Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
Reorganized Debtors at the above-referenced address or by email at PGEclaims@kbkllp.com so as to
17 be received by no later than **4:00 p.m. (Pacific Time) on October 14, 2020**. Any oppositions or
responses must be filed and served as described in the *Order Approving (A) Procedures for Filing*
18 *Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,
entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief**
19 **requested in the Omnibus Objection may be granted without a hearing if no opposition is timely**
20 **filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the
Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and
related Adversary Proceedings.

21 **PLEASE TAKE FURTHER NOTICE** that a customized Thirteenth Omnibus Claim
22 Objection Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the
23 parties to whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

24 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
25 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
26 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
27 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: September 17, 2020

KELLER BENVENUTTI KIM LLP

2 /s/ Peter J. Benvenutti

3 Peter J. Benvenutti

4 *Attorneys for Debtors and Reorganized Debtors*

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit A
Thirteenth Omnibus Claim Objection Notice

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbbkllp.com)

4 Peter J. Benvenutti (#60566)

5 (pbenvenutti@kbbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED DEBTORS' THIRTEENTH OMNIBUS OBJECTION TO CLAIMS (INCORRECT DEBTOR CLAIMS)

Response Deadline:
October 14, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 28, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

On September 17, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Thirteenth Omnibus Objection to Claims (Incorrect Debtor Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by October 14, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

October 28, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, all hearings through September 30, 2020 will be held by video or teleconference. **Parties are advised to visit the Bankruptcy Court’s website, at www.canb.uscourts.gov, prior to the hearing date to determine whether the Omnibus Hearing will be conducted telephonically and the courtroom will be closed.** If so, all parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
2 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
4 Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined
5 therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim
6 was filed in the Chapter 11 Case of the wrong Debtor and that the liability for such claims, if any,
7 should be properly asserted against a different Debtor. If you do **NOT** oppose the disallowance of
8 your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to
9 this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the
10 Objected-To Claim(s) will be disallowed.

11 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your
12 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
13 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
14 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on October**
15 **14, 2020 (the “Response Deadline”):** You must file the Response through the Court’s electronic case
16 filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’
17 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
18 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
19 the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must
20 arrange for the Response to be filed with the Court within two business days thereafter. If you do not
21 have the ability to serve a Response electronically, the Response must be served by mail, express or
22 some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the
23 Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or
24 commercial express service that will make actual delivery not more than two business days after the
25 Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by
26 email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,
27 the number of the Omnibus Objection, and the fact that a paper Response is being delivered by
28 express.

1 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
2 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
3 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
4 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
5 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
6 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
7 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
8 and/or the name, address, and telephone number of your attorney and/or designated representative to
9 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
10 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
11 otherwise resolve the Omnibus Objection on your behalf, if any.

12 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
13 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
14 later date. You will receive a separate notice of any such objection.

15 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
16 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
17 (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account
18 required], (ii) for free by download from on the Reorganized Debtors’ approved notice and claim

1 agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
2 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
3 request a complete copy of the Omnibus Objection, including all Exhibits.

4 Dated: September 17, 2020

KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

Attorneys for Debtors and Reorganized Debtors